CAST
Universal Design for Learning

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To Whom It May Concern:

Thank you for this opportunity to respond. This is CAST's second response to the PARCC proposed accommodation policies.

CAST is a nonprofit educational research and development organization that works to expand learning opportunities and outcomes for all individuals through Universal Design for Learning (UDL). CAST has defined the principles and practices of UDL, which guides the design of flexible instructional goals, methods, materials, and assessments that consider from the outset the diversity and natural variability of learners in any educational setting.

CAST is known for its development of innovative, technology-based educational resources and strategies based on universal design and the principles of UDL. Some highlights include:

- Originator of UDL principles and practices, which are incorporated into the 2008 Higher Education Opportunity Act, the 2010 National Educational Technology Plan, as well as many US Department of Education priorities, National Science Foundation grants, and private education initiatives (e.g., Google, Carnegie Corporation, Gates Foundation).
- Inventor and developer of Bobby, the first software to check website accessibility and guide Web designers to make improvements. Bobby has earned numerous awards.
- Creator (with Scholastic) of WiggleWorks, the first universally designed literacy program for beginning readers and winner of a Smithsonian Award for Innovation.
- Creator of CAST eReader, one of the first computer-based literacy tools to give learners of all abilities full access to e-text while supporting and enhancing their literacy development.
- Leader in developing the first National Instructional Materials Accessibility Standard (NIMAS) which guides the production and electronic distribution of digital versions of textbooks and other instructional materials so they can be more easily converted to a variety of accessible formats, including Braille and text-to-speech and was incorporated into IDEA regulations in August 2006.
- Leader of the National Accessible Instructional Materials (AIM) Center (and its predecessor, the AIM Consortium), a federally funded, collaborative effort by States to improve the quality, availability, and timely delivery of AIM.

- Partner with the University of Kansas and NASDSE in the federally supported Center on Online Learning and Students with Disabilities to evaluate policies and research whether online learning is working for students with disabilities and to develop new methods of using technology to improve learning.
- Lead partner (with Vanderbilt University) in the federally funded National Center on the Use of Emerging Technologies to Improve Literacy Achievement for Students with Disabilities in Middle School. The Center is researching and developing a technology-rich learning environment—the Universal Literacy Network—that enables schools to provide personalized literacy support and instruction across content areas, leveraging the Internet.

Through strategic collaborations, CAST continues to work on behalf of all learners, especially those with disabilities, by seeding the fields of education research, policy, professional development, and product development with UDL-based solutions. Based on CAST's extensive experience in universal design and the principles of UDL, we offer the following comments to the PARCC **Draft Policies on Writing Access Accommodations for Students with Disabilities:**

General Comments:

CAST continues to believe that it is premature to discuss specific accommodations for discrete subgroups of students with disabilities for the PARCC assessments without first clarifying which embedded accessibility features will be available to all test takers. Similarly, it is challenging to comment on particular accommodations in isolation from the full range of accommodations that will ultimately be made available in the PARCC Accommodations Manual.

We note PARCC's assertion that neither a scribe nor word prediction would invalidate constructs measured on the PARCC ELA/literacy assessments. This statement reinforces the need for PARCC to provide greater clarification on item design procedures and to be explicit in identifying the particular constructs that each item is intended to measure. IDEA regulations require states to adopt guidelines for the provision of appropriate accommodations that "(i) identify only those accommodations for each assessment that do not invalidate the score; and (ii) instruct IEP Teams to select, for each assessment, only those accommodations that do not invalidate the score." (34 C.F.R. § 300.160(b)). Assessments that are built in a digital environment, rather than a paper-and-pencil format, have greater potential to address construct irrelevance and to promote enhanced levels of access for all students, including those with disabilities. It is therefore critical for PARCC to identify the embedded accessibility features that will be used and to be explicit about the intended constructs for each item prior to proposing specific accommodations policies.

Our primary concern remains to ensure that students with disabilities have a meaningful opportunity to demonstrate what they know and can do, and to attain the same level of achievement as their peers without disabilities. The importance of access cannot be overstated;

the participation of students with disabilities in PARCC assessments will have a direct impact on what happens in the classroom and on the involvement and progress of these students in the general education curriculum aligned to the Common Core State Standards. As we noted in our prior comments for the read-aloud and calculator accommodations, the denial of an accommodation that does not invalidate intended constructs for students who, because of their disability-related needs, require such an accommodation in order to demonstrate what they know and can do would deny these students comparable aids, benefits, and services under Section 504 (34 C.F.R. § 104.4(b)).

Moreover, the list of assistive technologies enumerated in the definition of "scribe" seems to imply that writing will not be dependent on embedded features but will allow for the use of each learner's IEP-identified scribe/word prediction accommodation. This approach seems to be different from what had been implied in the *Draft Policy on PARCC Reading Access Accommodations for Students with Disabilities* reading access accommodations. In that document, it appeared that the delivery of reading access via "human read-aloud, recorded voice presented via an audio file, and other text-to-speech technologies" would be restricted, at least during digital delivery, to supports embedded in the PARCC assessment itself.

As a result CAST has three questions regarding the application of assistive technologies:

- Is it the case that PARCC wishes to allow students with disabilities to use the assistive technologies identified in their IEP as a writing accommodation but not as a reading accommodation?
- Alternatively, does PARCC support a student's use of preferred assistive technologies as both a reading and writing accommodation?
- If a student is able to use his or her identified assistive technology as a writing or reading support, will those familiar supports be available in addition to the embedded "full range of accommodations and accessibility features PARCC will outline later this year in the *PARCC Accommodations Manual*"?

Additionally, in consideration of accommodations, we are also concerned that several states now require high school students to take at least one online course during their high school education, in order for them to be college ready. Colleges increasingly rely on online and blended learning environments to deliver courses and programs. Those courses that utilize appropriate digital media can allow for multiple means for students to communicate since such media typically have built-in scaffolds such as word prediction, spell checking, and browse-aloud tools. We agree with the National High School Center when it states that if students are not allowed to use all the tools that will be available to them in college settings and in their careers for learning, they risk not building the academic and employable skills they will need for future success, skills such as inquisitiveness and intellectual openness; organization, study, and research skills, attendance and engagement; teamwork and collaboration; and effective communication (National High School Center, 2013).

Specific Comments about the Proposed Language in the Accommodations Policies

In addition to our overall concerns stated above, we have several additional concerns about the specific language proposed under these sections.

PARCC Draft Statement: ***Definition and Proposed Eligibility Requirement for a Scribe Accommodation***

*A scribe is a human or device that records verbatim what a student dictates. The scribe accommodation allows eligible students with disabilities access to the ELA/literacy summative test either through **dictation** of responses to a human scribe, recording device, augmentative/ assistive communication device, speech-to-text software (translates oral dictation into printed text), communication interpretation/transliteration or by gesturing, pointing, or eye-gazing. The use of a scribe will not invalidate constructs measured on the PARCC ELA/literacy assessments.*

COMMENT: If the use of a scribe will not invalidate constructs measured on the ELA/literacy assessment, then there should be little concern about ensuring that the precise population is identified. In other words, it would make sense to have this accommodation available for all students taking the writing assessment.

PARCC Draft Statement: *These accommodations must be provided in a 1:1 test setting in order to prevent other students from overhearing or viewing a student's response (e.g., gesturing pointing or eye-gazing) to the test items.*

COMMENT: If the student must speak either orally or by means of an augmentative communication device to a scribe, then it is clear why the assessment must be provided in a 1:1 test setting. On the other hand, if the student is using eye gaze or even a switch to directly express his or her thoughts using a computer, a 1:1 test setting would seem overly restrictive because speech is not being generated.

PARCC Draft Statement: *Students are required to capitalize and punctuate responses during dictation. Additional guidance on test administration protocols will be forthcoming from PARCC in the full accommodations manual.*

COMMENT: Having to capitalize and punctuate during oral expression seems likely to interrupt the normal flow of writing for a student who requires a scribe or uses speech to text software. For some learners, cognitive load will become an issue, and for others working memory issues will cause difficulty with continuous expression. Speech-to-text programs will generally automatically capitalize after a period and given that this is one type of scribe that is identified, it would seem not to invalidate constructs that are being measured. Additionally, the question arises: Are writing mechanics a part of the construct being measured? If not, then this policy restriction is unnecessary.

PARCC Draft Statement: ***Proposed Eligibility Requirements***

*There are two distinct populations of students for whom the **scribe accommodation** is being proposed:*

- *Student with a physical disability that impedes the motor process of writing.*
  OR
- *Student with a disability that significantly impacts the area of written expression.*

COMMENT: We agree. These do seem like the appropriate populations for a scribe accommodation.

PARCC Draft Statement: *For students identified with a disability that significantly impacts the area of written expression, to be eligible for the scribe accommodation, a student must also meet the following conditions:*

- *Student receives ongoing, research-based interventions for written expression , as deemed appropriate by the IEP team and indicated as a specific instructional goal in the student's IEP;*

COMMENT: Not all learners within the populations identified by the first two bullets are likely to have research-based interventions outlined by a goal within the IEP. Also, for this population, there may be difficulty identifying appropriate research-based interventions unless PARCC can offer a list that considers the significant variability within these groups.

PARCC Draft Statement:

- *Student only has access to written expression during routine instruction through the use of a scribe, outside of time spent in direct writing instruction.*

COMMENT: The placement of the word "only" would seem to make this eligibility requirement overly restrictive, especially if a student typically depends on the use of the scribe but is attempting to learn other approaches that may or may not be sustained.

PARCC Draft Statement: *For all eligible students:*

- *The accommodation must be decided upon by the IEP team, and listed in an approved IEP documented by objective, measurable data and evaluation reports.*

COMMENT: It is not clear what must be documented by objective, measurable data and evaluation reports.

PARCC Draft Statement*: **Definition and Proposed Eligibility Requirements for Word Prediction***

Word prediction software provides students with disabilities a word bank of frequently- or recently-used words based on a partial spelling of a word by the student. Word prediction is being recommended as a writing access accommodation for a small number of students who meet specific eligibility requirements and who have difficulty producing text due to their limited motor ability to enter keystrokes and/or their ability to recall language. The use of word prediction software will not invalidate constructs measured on the PARCC ELA/literacy assessments.

COMMENT: This would imply that spelling and rate of writing would not be key constructs on the writing assessment.It is not clear whether the student will be familiar with the allowed word prediction accommodation a) if not used on a regular basis, or b) if the word prediction accommodation will be embedded in the PARCC assessment and therefore require training and practice in order to perform within reasonable time limitations.

PARCC Draft Statement: ***Proposed Eligibility Requirements***

*There are two distinct populations of students for whom the **word prediction accommodation** is being proposed:*

- *Student with a specific disability who has difficulty producing text due to the speed with which they are able to enter keystrokes;*
  OR
- *Student with a significant disability that impedes language processing and/or recall.*

COMMENT: We agree. These do seem like the appropriate populations for a word prediction accommodation.

PARCC Draft Statement: *For students identified with a specific disability that impacts the area of language processing and/or recall, to be eligible for the word prediction accommodation, a student must also meet the following conditions:*

- *Student receives ongoing, research-based interventions for language processing and/or recall, as deemed appropriate by the IEP team and indicated as a specific instructional goal in the student's IEP;*

COMMENT: Not all learners within the populations identified by the first two bullets are likely to have research-based interventions outlined by a goal within the IEP. Also, for this population, there may be difficulty identifying appropriate research-based interventions unless PARCC can offer a list that considers the significant variability within these groups.

PARCC Draft Statement: ***AND***

- *Student only has access to written expression during routine instruction through the use of word prediction software outside of time spent in direct writing instruction.*

COMMENT: The placement of the word "only" would seem to make this eligibility requirement overly restrictive, especially if a student typically depends on the use of word prediction but is attempting to learn other approaches that may or may not be sustained.

PARCC Draft Statement*: For all eligible students:*

- *The accommodation must be decided upon by the IEP team, and listed in an approved IEP documented by objective, measurable data and evaluation reports.*

COMMENT: It is not clear what must be documented by objective, measurable data and evaluation reports.

PARCC Draft Statement*: **Scoring and Reporting***

- *Summative assessment scores for students who receive writing access accommodations will be aggregated with the scores of other students and those of relevant subgroups.*
    - *Scores will be included for accountability purposes.*
    - ***Confidential** parent/guardian reports, **non-public** rosters of school- and district-level results, and other non-public reports will include **notations** in cases where these accommodations were provided. District and school reports available to the public will not include the notations in cases where these accommodations were used.*
- *As with all accommodations, PARCC states will monitor the number and percentage of students using these accommodations at the school, district, and state level.*

COMMENT: It is not clear why non-public rosters should include notations regarding these accommodations since there was no violation of construct. If these accommodations do not invalidate the construct, why include them in this documentation process? The justification for including such information in the students' own files should only pertain to decision-making for future assessments. If it is the case that these accommodations do not violate the construct being measured, why aren't they available for all students?

Conclusion

We urge PARCC to reconsider the stated accommodation policies. CAST feels strongly that incorporating the principles of UDL into the PARCC assessments will help to ensure full and meaningful participation of all students, including those with disabilities. We look forward to the opportunity to work with you in this effort toward creating fair and relevant assessments for all learners.

Sincerely,

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